

May 2, 2005

Mr. William J. Gaffney
NAPA SANITATION DISTRICT
935 Hartle Court
Napa, CA 94559

Re: March 2005 Compliance Monitoring Results for the Jefferson Car Wash Site Groundwater Extraction and Treatment System, 3080 Jefferson Street, Napa, California, Industrial User Permit No. 495950.

Dear Mr. Gaffney:

This letter presents the results of March 2005 Compliance Monitoring for the Groundwater Extraction and Treatment System (System) at the Jefferson Car Wash site, 3080 Jefferson Street, Napa, California. Compliance monitoring and reporting have been conducted in accordance with the guidelines stipulated in the Industrial User Permit No. 495950. Presented herein are the results of the 12th compliance monitoring event after System start-up on March 29, 2004.

The compliance monitoring activities for this reporting period were performed by Decon Environmental Services, the operations and maintenance (O&M) contractor for the System, under the direction of Malcolm Pirnie on April 11, 2005. The monitoring activities included:

1. Sampling the System effluent.

2. Recording the total volume of raw water discharged from individual extraction wells (EW-2 and EW-3).

3. Recording the total volume of treated water discharged to sanitary sewer.

Per the Permit requirements, effluent samples were analyzed for total petroleum hydrocarbons as diesel (TPH-D) by United States Environmental Protection Agency (USEPA) Method 8015M, TPH as gasoline (TPH-G), benzene, toluene, ethylene, total xylenes (BTEX), and methyl-tertiary-butyl ether (MTBE) by USEPA Method 8260B, and total lead by USEPA Method 6010B.

Mr. William J. Gaffney NAPA SANITATION DISTRICT

Table 1 presents the analytical results for the System effluent and the System flow parameters. The analytical laboratory report is attached.

The analytical laboratory reported the concentrations of constituents of concern to be non-detect in the System effluent. The average daily discharge rate for this reporting period was estimated to be 6.77 gallons per minute (gpm), which was below the 8 gpm limit. A total of 380,293 gallons of treated water was discharged to the sanitary sewer during this reporting period.

Please contact Jason at (510) 732-6444 Ext. 17 or Todd Miller with Malcolm Pirnie at (510) 735-3014 to discuss any comments or questions.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that a qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Sincerely,

DECON ENVIRONMENTAL SERVICES

Jason Gulbransen Project Manager

1. Julbours

Attachments: Table 1, Analytical Laboratory Report

George Altamura, Altamura Enterprises
 Joel Coffman, Napa County
 Todd Miller, Malcolm Pirnie

Mr. William J. Gaffney NAPA SANITATION DISTRICT

File (4459-008)
P:\u00e4459\008\GWTS Compliance Monitoring\Text\March 2005 Compliance Monitoring Letter Report.doc

TABLE 1

Compliance Monitoring Results, March 2005 Interim Groundwater Extraction and Treatment System Jefferson Car Wash Site

Industrial User Permit No: 495950

Parameter	Units	USEPA Method	Date Collected	System Effluent	Permitted Reporting Limit ¹
Volatile Organic Compounds					
Methyl Tertiary-Butyl Ether	$\mu g/L^2$	8260B	4/11/2005	< 1	1.0% LEL ³
Benzene	μg/L	8260B	4/11/2005	< 0.5	1.0% LEL
Toluene	μg/L	8260B	4/11/2005	< 0.5	1.0% LEL
Ethylbenzene	μg/L	8260B	4/11/2005	< 0.5	1.0% LEL
Xylenes, Total	μg/L	8260B	4/11/2005	< 0.5	1.0% LEL
TPH as Gasoline	μg/L	8260B	4/11/2005	< 25	4
TPH as Diesel	μg/L	8015M	4/11/2005	< 50	
Total Lead	mg/L ⁵	6010B	4/11/2005	< 0.05	0.14
Operational					
Total Volume Discharged to Sanitary Sewer ⁶	gallons		4/11/2005	380,293	
Daily Average System Flow Rate ⁷	gpm ⁸		4/11/2005	6.77	8

Notes:

- i.e., $\{$ Sum of Flow Totalizer Volume at EW-2 and EW-3 for this period $\}$ -
 - { Sum of Flow Totalizer Volume at EW-2 and EW-3 for the previous period }

¹ As stated in Industrial User Permit, No: 495950, issued for the System on 03/02/2004.

² Micrograms per liter.

³ Lower explosive limit.

⁴ No reporting limit stated or not applicable.

⁵ Milligrams per liter.

⁶ The sum of volumes extracted from individual wells, EW-2 and EW-3, for this period as recorded by the flow totalizer at the respective well-head.

⁷ Calculated as the *Total Volume Discharged to Sanitary Sewer* divided by the number of days the system was in operation during the reporting period (39 days for this period).

⁸ Gallons per minute.

3334 Victor Court • Santa Clara, CA 95054 • (408) 588-0200 • Fax (408) 588-0201

Jason Gulbransen

Certificate ID: 43149 - 4/14/2005 12:07:21 PM

Decon Environmental Services, Inc.

23490 Connecticut Street

Hayward, CA 94545

Order Number: 43149

Project Name: Jefferson Carwash

Project Number: 4470

Date Received: 4/12/2005 12:29:23 PM

P.O. Number: 4470

Certificate of Analysis - Final Report

On April 12, 2005, sample was received under chain of custody for analysis. Entech analyzes samples "as received" unless otherwise noted. The following results are included:

Matrix

Test

Method

Comments

Liquid

EPA 8260B

EPA 8260B EPA 6010B

Metals
TPH as Gasoline by GC/MS

GC-MS

TPH-Extractable

EPA 8015 MOD. (Extractable)

Entech Analytical Labs, Inc. is certified for environmental analyses by the State of California (#2346). If you have any questions regarding this report, please call us at 408-588-0200 ext. 225.

Sincerely,

Laurie Glantz-Murph Laboratory Director

3334 Victor Court, Santa Clara, CA 95054

Phone: (408) 588-0200

Fax: (408) 588-0201

Decon Environmental Services, Inc.

23490 Connecticut Street Hayward, CA 94545 Attn: Jason Gulbransen

Project Number: 4470

Project Name: Jefferson Carwash

Date Received: 4/12/2005 P.O. Number: 4470 Sample Collected by: Client

Certificate of Analysis - Data Report

Lab #: 43149-001 Sample ID: Discharge Point

Matrix: Liquid Sample Date: 4/11/2005

8:17 AM

Method: EPA 6010B - ICP-AES

Pren Method: EPA 3005A - Acid Digestion for ICP

Trep facilion. Et /x 5005/x - /xelu D	igestion for	101							
Parameter	Result	Flag	DF	Detection Limit	Units	Prep Date	Prep Batch	Analysis Date	QC Batch
Lead	ND		1	0.05	mg/L	04/12/2005	WM050412	04/13/2005	WICP2050413-2

Analyzed by Equeja Reviewed by: DQUEJA

Method: EPA 8015 MOD. (Extractable)

Prep Method: EPA 3510C - Liq-Liq, Sep Funnel, MeCl

Parameter	Result	Flag DF	Detection Limit	Units	Prep Date	Prep Batch	Analysis Date	QC Batch	
TPH as Diesel	ND	1	50	μg/L	04/12/2005	DW050412	04/13/2005	DW050412	
Surrogate	Surrogate Recovery	Control I	Limits (%)		To a factor of the second		Analyzed by: Jhsian	ıg	
o-Terphenyl	67.8	22 -	133				Reviewed by BDH	ABALIA	

Method: EPA 8260B - Gas Chromatography/Mass Spectrometry (GC/MS)

Prep Method: EPA 5030B - Purge-and-Trap for Aqueous Samples

Parameter	Result	Flag	DF	Detection Limit	Units	Prep Date	Prep Batch	Analysis Date	QC Batch
Benzene	ND		1	0.5	μg/L	N/A	N/A	04/13/2005	WMS1050413
Toluene	ND		1	0.5	μg/L	N/A	N/A	04/13/2005	WMS1050413
Ethyl Benzene	ND		1	0.5	μg/L	N/A	N/A	04/13/2005	WMS1050413
Xvlenes, Total	ND		1	0.5	μg/L	N/A	N/A	04/13/2005	WMS1050413
Methyl-t-butyl Ether	ND		1 -	1	μg/L	N/A	N/A	04/13/2005	WMS1050413

Surrogate	Surrogate Recovery	Control Limits (%)	Analyzed by: Xbian
4-Bromofluorobenzene	97.8	75 - 125	Reviewed by: MTU
Dibromofluoromethane	110	75 - 125	
Toluene-d8	102	75 - 125	

Method: GC-MS - Gas Chromatography/Mass Spectrometry (GC/MS)

Prep Method: EPA 5030B - Purge-and-Trap for Aqueous Samples

Parameter	Result	Flag	DF	Detection Limit	Units	Prep Date	Prep Batch	Analysis Date	QC Batch
TPH as Gasoline	ND		1	25	μg/L	N/A	N/A	04/13/2005	WMS1050413
Surrogate	Surrogate Recovery	Co	ntrol Li	mits (%)		-		Analyzed by Xbian	1
4-Bromofluorobenzene	99.5		75 -	125				Reviewed by: MTU	J
Dibromofluoromethane	114		75 -	125					
Toluene-d8	106		75 -	125					

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Phone: (408) 588-0200 Fax: (408) 588-0201

Quality Control - Method Blank Liquid

QC/Prep Batch ID: WM050412

QC/Prep Date: 4/12/2005

Validated by: DQUEJA - 04/13/05

Method Blank

Method: EPA 6010B

Parameter

Lead

Result ND

Spike Amt

0.50

0.50

DF

PQLR 0.05

Units mg/L

Quality Control - Laboratory Control Spike / Duplicate Results

Liquid

Reviewed by: DQUEJA - 04/13/05

Prep Batch ID: WM050412

QC BatchID: WICP2050413-2

Prep Date: 4/12/2005

Analysis Date: 4/13/2005

Method: EPA 6010B

Conc. Units: mg/L

LCS

Blank (MDL) Parameter Lead < 0.02

Conc. Units: mg/L

RPD **RPD** Limits

Recovery Limits 75 - 125

Method: EPA 6010B

LCSD

Parameter Lead

Blank (MDL)

< 0.02

SpikeResult Spike Amt 0.48

SpikeResult

0.49

% Recovery 95.1

% Recovery

98.7

RPD 3.7

RPD Limits 25.0

Recovery Limits 75 - 125

QCReport - spatel - 4/14/2005 12:08:04 PM

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Quality Control - Method Blank Liquid

QC/Prep Batch ID: DW050412

QC/Prep Date: 4/12/2005

Validated by: BDHABALIA - 04/13/05

Method Blank

Method: EPA 8015 MOD. (Extractable)

Parameter

Result ND DF

PQLR 50 Units µg/L

TPH as Diesel
Surrogate for Blank

% Recovery Control Limits

o-Terphenyl

91.5 22 - 133

Quality Control - Laboratory Control Spike / Duplicate Results

Liquid

Reviewed by BDHABALIA - 04/13/05

Prep Batch ID: DW050412

QC BatchID: DW050412

Prep Date: 4/12/2005

Analysis Date: 4/12/2005

	015 MOD. (Extractable)			Conc. Un	its: μg	z/L		
LCS Parameter	Blank (MDL)	Spike Amt	SpikeResult	% Recovery	RPD	RPD Limits	Recovery Limits	
TPH as Diesel	<20	1000	840	83.8			40 - 138	
TPH as Motor Oil	<90	1000	640	63.9			41 - 88	
Surrogate	% Recovery Control Li	mits						

o-Terphenyl 98.9 22 - 133

Method: EPA 8015 MOD. (Extractable)

Conc. Units: µg/L

LCSD

Parameter	Blank (MDL)	Spike Amt	SpikeResult	% Recovery	RPD	RPD Limits	Recovery Limits
TPH as Diesel	<20	1000	920	91.9	9.2	25.0	40 - 138
TPH as Motor Oil	<90	1000	650	65.1	2.0	25.0	41 - 88

Surrogate % Recovery Control Limits o-Terphenyl 101 22 - 133

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Quality Control - Method Blank

Liquid

QC Batch ID: WMS1050413

QC Batch ID Analysis Date: 4/13/2005

Validated by: MTU - 04/14/05

Method Blank	Meth	od: EPA 8260	В			
Parameter			Result	DF	PQLR	Units
Benzene			ND	1	0.5	μg/L
Ethyl Benzene			ND	1	0.5	μg/L
Methyl-t-butyl Ether			ND	1	1	μg/L
Γoluene			ND	1	0.5	μg/L
Kylenes, Total			ND	1	0.5	μg/L
Surrogate for Blank	% Recovery	Control Limits				
-Bromofluorobenzene	96.3	75 - 125				
Dibromofluoromethane	108	75 - 125				
Toluene-d8	100	75 - 125				

Quality Control - Laboratory Control Spike / Duplicate Results

Liquid

Reviewed by: MTU - 04/14/05

QC BatchID: WMS1050413 Analysis Date: 4/13/2005

						Anal	lysis Date: 4.	/13/2005
Method: EPA 8260)B				Conc. Un	its: μg	:/L	
LCS								
Parameter		Blank (MDL)	Spike Amt	SpikeResult	% Recovery	RPD	RPD Limits	Recovery Limits
Benzene		<0.2	20	20	99.5			80 - 120
Methyl-t-butyl Ether		< 0.3	20	22	111			80 - 120
Toluene		<0.2	20	19	96.5			80 - 120
Surrogate	% Recover	y Control Li	mits					
4-Bromofluorobenzene	95.4	75 - 13	25					
Dibromofluoromethane	101	75 - 13	25					
Toluene-d8	96.2	75 - 12	25.					
Method: EPA 8260	В				Conc. Un	its: μg	/L	
Parameter		Blank (MDL)	Spike Amt	SpikeResult	% Recovery	RPD	RPD Limits	Recovery Limits
Benzene		<0.2	20	19	95.5	4.1	25 0	80 - 120
Methyl-t-butyl Ether		< 0.3	20	22	109	1.4	25.0	80 - 120
Toluene		<0.2	20	19	92.5	4.2	25.0	80 - 120
Surrogate	% Recover	y Control Li	mits		1			
4-Bromofluorobenzene	94.7	75 - 1	25					
Dibromofluoromethane	100	75 - 1	25					
Toluene-d8	96.4	75 - 1	25					

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Phone: (408) 588-0200

Fax: (408) 588-0201

Quality Control - Method Blank

Liquid

QC Batch ID: WMS1050413

QC Batch ID Analysis Date: 4/13/2005

Validated by: MTU - 04/14/05

Method Blank	Meth	od: GC-MS					
Parameter			Result	DF	PQLR	Units	
TPH as Gasoline			ND	1	25	μg/L	
Surrogate for Blank	% Recovery	Control Limits					
4-Bromofluorobenzene	97.9	75 - 125					
Dibromofluoromethane	113	75 - 125					
Toluene-d8	104	75 - 125					

Quality Control - Laboratory Control Spike / Duplicate Results

Liquid

Reviewed by: MTU - 04/14/05

QC BatchID: WMS1050413 Analysis Date: 4/13/2005

Method: GC-MS					Conc. Un	its: μg	/L		
Parameter	Bl	lank (MDL)	Spike Amt	SpikeResult	% Recovery	RPD	RPD Limits	Recovery Limits	
TPH as Gasoline		<6	130	160	125			65 - 135	
Surrogate	% Recovery	Control Li	nits						
4-Bromofluorobenzene	99.5	75 - 12	25						
Dibromofluoromethane	107	75 - 12	25						
Toluene-d8	105	75 - 12	25						
Method: GC-MS	-		-	-	Conc. Un	its: μg	/L		
Parameter	- B	lank (MDL)	Spike Amt	SpikeResult	% Recovery	RPD	RPD Limits	Recovery Limits	
TPH as Gasoline		<6	130	150	119	5.1	25.0	65 - 135	
Surrogate	% Recovery	Control Li	mits						
4-Bromofluorobenzene	99.3	75 - 13	25						
Dibromofluoromethane	106	75 - 13	25						
Toluene-d8	106	75 - 13	25						

Chain of Custody / Analysis Request Remarks RCRA-8 PPM-13 LUFT-5 2, 671,238 **CAM-17** Plating Chemistry 00000 Zip: General Quote No.: **EDD Report** EDF Report Al, As, Sb, Ba, Be, Bi, B, Cd, Ce, Ca, Cr, Co, Cs, Cu, Fe, (Pb) Mg, Mn, Ga, Ge, Hg, In, Li, Mo, Ni, P, K, Si, Ag, Na, S, Se, Sr, Ta, Te, Tl, Sn, Ti, Zn, V, W, Zr State: ___ GC Methods Billing Address: (If Different) Invoice to: (If Different) Special Instructions or Comments Company: Project Name:
Sefferson (ar Wesh, GW) Jefferson 8th Norda Ca Purchase Order No.: OCKE Project Location: Project No.: Metals: No. of Containers Zip Code: Matrix 200 1 1 Day 1 3 Day 1 5 Day Turn Around Time

Same Day

2 Day

4 Day Phone No.:

5 10 78-4137

Fax No.:

5-10 782 - 4584 Time 0:8 `**x** 10 Day (408) 588-0200 (408) 588-0201 - Fax Sample AB149-001-1-16-05 State: Email Address: Date Lab. No. Field Org. Code: Santa Clara, CA 95054 Decon Env. Sucs 3334 Victor Court Client ID / Field Point Pischarge Point J Gulbiansen Hayward 23490 Scott madd Order ID: Attention to: Global ID: Sampler